

EXHIBIT H

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

ALAN DERSHOWITZ,

Defendant.

Civil Action No. 19-cv-03377-LAP

ALAN DERSHOWITZ,

Counterclaim Plaintiff,

v.

VIRGINIA L. GIUFFRE,

Counterclaim Defendant.

**PLAINTIFF'S OBJECTIONS AND RESPONSES TO
DEFENDANT'S FIRST SET OF INTERROGATORIES**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff Virginia Giuffre, by and through her counsel, provides the following Responses and Objections to Defendant Alan Dershowitz's First Interrogatories (hereinafter "Interrogatories") as follows:

GENERAL OBJECTIONS

1. Plaintiff objects to the Interrogatories to the extent that they attempt to impose obligations on Plaintiff beyond those imposed or authorized by the Federal Rules of Civil Procedure, the Local Civil Rules of the Southern District of New York, or any applicable order of the Court.

time. Ghislaine Maxwell would be in possession of the information relating to this cellphone.

Plaintiff can recall having the following cell numbers [REDACTED] Redacted- PII

[REDACTED]. Plaintiff's current cell phone number is not relevant to the issues in this case as it was obtained long after the relevant timeframe related to Plaintiff's allegations, and Plaintiff objects to providing that information as it would violate her privacy and could subject her to harassment. Plaintiff's current e-mail address is [REDACTED] Redacted- PII. Plaintiff had a Facebook account for a short time, but it is no longer active. Plaintiff maintains a Twitter account with the following handle: @VRSVirginia. Plaintiff's non-profit organization, Victims Refuse Silence has a website www.victimsrefusesilence.org.

Interrogatory No. 10: Identify each attorney who has represented You from 1998 to present, the dates of any such representation, and the nature of the representation.

Response to Interrogatory No. 10: Plaintiff incorporates the general objections as if specifically set forth here. In particular Plaintiff refers Defendant to the second general objection which sets forth the ways in which this Interrogatory violates Local Civil Rule 33.3. The information requested in this Interrogatory can more practicably be obtained from a request for production or a deposition. Plaintiff also objects to this Interrogatory to the extent it seeks privileged information.

Subject to and without waiving these objections, Plaintiff responds that she has been represented by the following attorneys:

- Bob Josefsberg and members of his firm, Podhurst Orsek, P.A., including Katherine W. Ezell and Amy Ederi (among other possible Podhurst Orsek, P.A. attorneys) represented Plaintiff as a party in the litigation styled as *Jane Doe No. 102 v. Jeffery Epstein*, Case No. 09-80656-civ-Marra/Johnson, starting on January 27, 2009.
- J. Stanley Pottinger represented Plaintiff as a non-party in the litigation styled as *Bradley Edwards and Paul Cassell v. Alan Dershowitz*, Case No. 15-000072, Seventeenth Judicial Circuit, Broward County, Florida, starting in February 2015 and in the litigation styled as *Giuffre v. Maxwell*, 15-cv-07433-RWS in the Southern District of New York, the complaint of which was filed in September 2015.

- Brad Edwards (along with other Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L. (“Farmer Jaffe”) attorneys) represented Plaintiff as a non-party in the litigation styled as *Jane Doe #1 and Jane Doe #2 v. United States*, Case No, 08-80736-CIV-arra, Southern District of Florida, starting in 2014. Brad Edwards (along with other Farmer, Jaffe attorneys) also represented Plaintiff as a party in the litigation styled *Giuffre v. Maxwell*, 15-cv-07433-RWS in the Southern District of New York, the complaint of which was filed in September 2015.
- Brad Edwards provided Plaintiff with legal advice concerning media inquiries Plaintiff had received starting in 2011.
- Paul Cassell, a Professor of Criminal Law at the S.J. Quinney College of Law at the University of Utah, represented Plaintiff as a non-party in the litigation styled as *Jane Doe #1 and Jane Doe #2 v. United States*, Case No, 08-80736-CIV-arra, Southern District of Florida, starting in May 2014. Paul Cassell also represented Plaintiff as a party in the litigation styled *Giuffre v. Maxwell*, 15-cv-07433-RWS in the Southern District of New York, the complaint of which was filed in September 2015.
- Paul Cassell, Brad Edwards (along with other Farmer, Jaffe attorneys), Stan Pottinger, David Boies (along with other Boies Schiller attorneys) represented Plaintiff regarding investigations into potential legal action starting in the second half of 2014.
- Paul Cassell, Brad Edwards (along with other Farmer, Jaffe attorneys), Stan Pottinger, David Boies, and Sigrid McCawley (along with other Boies Schiller attorneys) represented Plaintiff as a cooperating witness with regard to a law enforcement investigation starting in May 2015.
- Paul Cassell provided Plaintiff with legal advice concerning potential legal action starting in early 2011.
- Paul Cassell and Brad Edwards (along with other Farmer, Jaffe attorneys) represented Plaintiff and Victims Refuse Silence (“VRS”), giving legal advice regarding VRS, starting in October 2014.
- Meg Garvin (law professor at Lewis & Clark Law School, and the Executive Director of the National Crime Victim Law Institute) represented Plaintiff and VRS, giving legal advice regarding VRS, starting in October 2014.
- David Boies and Sigrid McCawley (along with other Boies Schiller & Flexner LLP (“Boies Schiller”) attorneys) represented Plaintiff as a non-party in the litigation styled as *Bradley Edwards and Paul Cassell v. Alan Dershowitz*, Case No. 15-000072, Seventeenth Judicial Circuit, Broward County, Florida, starting in February 2015. David Boies and Sigrid McCawley (along with other Boies Schiller attorneys) represent Plaintiff as a party in the litigation styled *Giuffre v. Maxwell*, 15-cv-07433-RWS in the Southern District of New York, the complaint of which was filed in September 2015.
- Sigrid McCawley (along with other Boies Schiller attorneys) represented Plaintiff and VRS, giving legal advice regarding VRS, starting in February 2015.
- Chuck Cooper, Mike Kirk, Nicole Moss, Haley Proctor and other attorneys and staff at Cooper & Kirk, PLLC. represent Plaintiff in this Action and in the litigation styled *Giuffre v. Maxwell*, 15-cv-07433-RWS in the Southern District of New York, starting in November

2019.

- Wendy Heller and other attorneys and staff at the Law Offices of Wendy Heller represent Plaintiff in entertainment and media related matters starting January 16, 2020.

Dated: February 25, 2020

By: 
Virginia Giuffre

Dated: February 28, 2020

By: 

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Counsel for Plaintiff, Virginia Giuffre

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 28TH day of February, 2020, I served the attached document via e-mail and U.S. Mail, postage pre-paid, to the following counsel of record:

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By: 
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